



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 12, 2022

Nicole Perkinson  
a/o The Avon Company  
Toxicology & Regulatory Affairs  
7140 Heritage Village Plaza  
Gainesville, VA 20155-3061

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 –additional marketing graphic  
Product Name: Avon Skin-So-Soft SSS Gentle Breeze Bug Guard Plus IR3535 Insect Repellent Gentle Breeze SPF 30 Sunscreen Lotion  
EPA Registration Number: 806-13  
EPA Receipt Date: 10/25/2022  
Action Case Number: 00403148

Dear Ms. Perkinson:

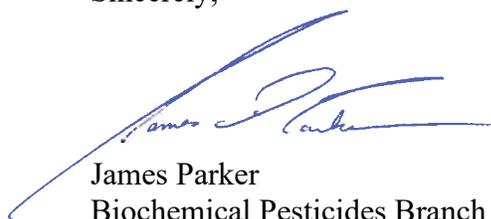
The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA’s Office of Enforcement and Compliance Assurance.

If you have any questions, please contact Sydnie Hetzel by phone at (202) 566-1606 or via email at [hetzel.sydney@epa.gov](mailto:hetzel.sydney@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", is written over a long, sweeping horizontal line that extends to the left.

James Parker  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511M)  
Office of Pesticide Programs

Enclosure

FRONT OF CONTAINER:

**[Original Brand Name]** AVON  
S  
S  
S  
SKIN-SO-SOFT  
GENTLE BREEZE™  
BUG GUARD  
*PLUS*  
IR3535®  
INSECT REPELLENT  
SPF 30  
MOISTURIZING SUNBLOCK LOTION

**NOTIFICATION**

806-13  
The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:  
12/12/2022

**[Alternate Brand Name #1]** (Notification submitted 2/4/03) - Bracketed information confined to sponge applicator container]

AVON [the words "E-Z SPONGE APPLICATOR" encircled around a  
SKIN-SO-SOFT diagram of tube with sponge applicator.]  
S BUG  
S GUARD  
S *PLUS*  
IR3535®  
[ACTIVE]  
INSECT REPELLENT  
GENTLE BREEZE™  
SPF 30  
MOISTURIZING SUNBLOCK LOTION

**[Alternate Brand Name #2]** – Bracketed information confined to sponge applicator container]

AVON [Words "E-Z SPONGE APPLICATOR" encircled around a  
SKIN-SO-SOFT diagram of container with sponge applicator]  
S BUG  
S GUARD  
S *PLUS*  
IR3535®  
[ACTIVE]  
INSECT REPELLENT  
GENTLE BREEZE™  
SPF 30 SUNSCREEN  
VERY WATER RESISTANT  
MOISTURIZING LOTION

**[Alternate Brand Name #3]** – Bracketed information confined to sponge applicator container]

AVON [Words "E-Z SPONGE APPLICATOR" encircled around a  
SKIN-SO-SOFT diagram of container with sponge applicator]  
S BUG  
S GUARD  
S *PLUS*  
IR3535® [ACTIVE]  
INSECT REPELLENT  
GENTLE BREEZE™  
SPF 30 SUNSCREEN  
WATER RESISTANT (80 MINUTES)  
MOISTURIZING LOTION

FOLLOWING IS APPLICABLE ALL FRONT LABELS [Bracketed information is optional package size]:

KEEP OUT OF REACH OF CHILDREN  
 CAUTION

ACTIVE INGREDIENTS:  
 beta-alanine, n-acetyl-N-butyl-, ethyl ester\* / carboxylic acid 7.5%  
 OTHER INGREDIENTS: 92.5%  
 TOTAL: 100.0%  
 \*IR3535®

4 FL. OZ. (118 ml) [2.5 FL. OZ. (75 ml)]

BACK OF CONTAINER:

[Bracketed information confined to use on sponge applicator container]

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply liberally 15 minutes before sun and insect exposure [using the E-Z Sponge Applicator]. An adult must apply this product to children under 10. Children under 6 months: Ask a doctor. For insect protection, reapply about every 2 hours or sooner if effectiveness diminishes. For sunscreen protection, reapply immediately after towel drying, after 80 minutes of swimming or sweating, at least every 2 hours. Do not exceed 9 applications per day.

<b>STORAGE AND DISPOSAL:</b>	
STORAGE: Store in cool, dry place away from heat or flame.	DISPOSAL: <b>If empty:</b> Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Protect this product from sun.

**PRECAUTIONARY STATEMENTS:** HAZARDS TO HUMANS. **Caution.** For external use only. Causes moderate eye irritation. **When using this product** keep out of eyes. **Do not use** on damaged or broken skin. **Stop use and ask a doctor** if rash occurs. **Keep out of reach of children.** **Skin Cancer/Skin Aging Alert:** Spending time in the sun increases your risk of skin cancer and early aging. This product has been shown only to prevent sunburn, **not** skin cancer or early aging.

<b>FIRST AID</b>	
If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

ACTIVE SUNSCREEN INGREDIENTS: Octinoxate 7.5%, Oxybenzone 6%, Octisalate 5%

OTHER INGREDIENTS: Water, Butylene Glycol, Glycerin, PVP/Eicosene Copolymer, Aloe Barbadensis Gel, Isostearic Acid, Propylene Glycol Myristyl Ether Acetate, Stearic Acid, Benzyl Alcohol, Cetyl Alcohol, DEA-Oleth-3 Phosphate, Diglycol/CHDM/Isophthalates/SIP Copolymer, Dimethicone, Glyceryl Stearate, Magnesium Aluminum Silicate, Tocopheryl Acetate,

Barium Sulfate, Fragrance, Imidazolidinyl Urea, Xanthan Gum, Disodium EDTA

To order, see an Avon Representative, or call 1-800-FOR-AVON [www.avon.com](http://www.avon.com)

Not for sale or use after expiration date.

EPA Reg. No. 806-13 EPA Est. No. 806-IL-1

[Distributed by] NEW AVON LLC

777 THIRD AVE. NY, NY 10017

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Day Lot Code

Exp. Year / Month

**Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional**

IR3535® is a registered trademark of Merck KGaA

Avoid contact with plastics, costume jewelry, leather and synthetic fibers

May damage painted or varnished surfaces, including nail polish

With vitamin E and aloe



REPELLENCY – IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, sand flies, gnats, no-see-ums and biting midges

Suitable for the entire family

Gentle formula does not need to be washed off when returning from the outdoors

Dermatologist-tested

Non-Comedogenic

Non-Acneogenic

Hypoallergenic

SPF 30 water resistant (80 minutes)

Helps prevent sunburn

PABA-Free

Moisturization

Non greasy formula helps replenish moisture and leaves skin soft and smooth

Pleasantly scented

Protects against mosquitos that may carry the Zika virus

Repels mosquitos that may carry the Zika virus

Protects against mosquitos that may carry the Dengue virus

Repels mosquitos that may carry the Dengue virus

Protects against mosquitos that may carry the Chikungunya virus

Repels mosquitos that may carry the Chikungunya virus

Designed for active people

Low odor formula

Won't harm your clothing or bathing suit

Effective, dependable insect repellency

Non-sticky

No unpleasant odor

Long lasting protection for the entire family

Smart (dependable) protection for the entire family

Fights off mosquitos and unwanted (certain) insects

Easy on skin, tough on bugs

The right protection for your family

